

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

In re

SANDRA LEE FERKETICH,

Debtor,

No. 10-15870-j7

**MOTION FOR PAYMENT OF UNCLAIMED FUNDS**

COMES NOW, Debtor Sandra Lee Ferketich, by and through her attorney of record, The Law Offices of Ron Holmes (Ron Holmes), and hereby respectfully moves this Court to enter an Order for payment of unclaimed funds and states the following:

1. Debtor filed for relief on November 24, 2010 under Chapter 7.
2. Michael J. Caplan was the duly appointed trustee and as fully administered the case.
3. As part of Mr. Caplan's duties to administer the case, Mr. Caplan deposited the sum of \$21,100.17 into the Court registry (see docket 23).
4. The original check written to Debtor Sandra Lee Ferketich was returned to the trustee as a result of an insufficient or incorrect mailing address for Debtor. Debtor has since updated her address with counsel of record and filed the same with the Court.
5. There is no dispute or controversy as to the ownership of these funds as they rightfully belong to the Debtor herein.

WHEREFORE, Debtor respectfully requests this Court issue a check payable to Debtor Sandra Ferketich in the amount of \$21,100.17 and any such further relief as the Court deems just and proper.

Respectfully submitted,

LAW OFFICES OF RON HOLMES

s/submitted electronically

Ron Holmes

Attorney for Debtor

112 Edith, NE

Albuquerque, NM 87102

Telephone: (505) 268-3999

Facsimile: (505) 268-3939

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing was mailed to:

- Michael J. Caplan michaelcaplanlaw@qwestoffice.net,  
tgarciaacapanlaw@qwestoffice.net;mcapan@ecf.epiqsystems.com
- Leonard K Martinez-Metzgar leonard.martinez-metzgar@usdoj.gov
- United States Trustee ustpreion20.aq.ecf@usdoj.gov
- Michael J. xCaplan michaelcaplanlaw@qwestoffice.net,  
tgarciaacapanlaw@qwestoffice.net;mcapan@ecf.epiqsystems.com
- Michael J. xCaplan michaelcaplanlaw@qwestoffice.net,  
tgarciaacapanlaw@qwestoffice.net;mcapan@ecf.epiqsystems.com

on this 9th day of August, 2012.

Electronically filed

Ron Holmes